

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

No. 5:09-CR-216-2,7,8-FL

UNITED STATES OF AMERICA,	:	
	:	
v.	:	
	:	GOVERNMENT'S MOTION
HYSEN SHERIFI	:	REGARDING EXHIBITS
MOHAMMAD OMAR ALY HASSAN	:	884R, 885R, 886R, and 887R
ZIYAD YAGHI	:	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, moves the Court to admit Exhibits 884R, 885R, 886R, and 887R as further described below. The exhibits, redacted versions of the Facebook returns earlier presented at 884, 885, 886, and 887, were admitted in testimony as each single page became relevant, rather than en masse. For this reason, the Government wishes to confirm the record of admission of each such page, and request admission of additional pages that had been present in the redacted package, but about which testimony was unnecessary, or upon which testimony would have been unnecessarily prolonged. The Government proposes the following:

1. Exhibit 884R

Exhibit 884R are the results of two captures of the Facebook page of Ziyad Yaghi, one dated December 13, 2006, and one dated December 18, 2006. As to the capture of December 13, 2006, upon

information and belief, pages 4 through 9, 11 through 19, and 22 through 34 were specifically admitted upon motion of the government. Additionally, the government moved into evidence a number of pages from the December 18, 2006 capture, or noted identity with pages from the December 13, 2006 capture, to include pages 36 through 44, 45 through 58, 61, and 62. The Government requests the Court also allow admission of pages 1, 2, and 3, which identify the exhibit as a Facebook record. If such is granted, Exhibit 884R would be comprised of pages 1 through 19, 22 through 34, 36 through 58, and 61 and 62.

## 2. Exhibit 885R

Exhibit 885R is a March 25, 2007 capture of the Facebook account of Ziyad Yaghi. Upon information and belief, the government moved in pages 3 through 11 during the testimony of Detective Robert Powell. The government requests pages 1 and 2 also be admitted into evidence, which identify the records as a Facebook record.

## 3. Exhibit 886R

Exhibit 886R is an August 27, 2007 capture of Omar Hassan's Facebook account. Upon information and belief, pages 4 through 12 were moved into evidence, and the government requests pages 1 through 3 be allowed as well. The additional pages simply demonstrate the records are records of Facebook.

4. Exhibit 887R

Exhibit 887R is an August 27, 2007 capture of the Facebook account of Naji Sarsour. Upon information and belief, the government moved into evidence pages 2, 3, and 4. The government now moves into evidence page 1, which identifies the record as one from Facebook.

Respectfully submitted, this 7th day of October, 2011.

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CERTIFICATE OF SERVICE

I certify that I have on this 7th day of October, 2011, served a copy of the foregoing upon counsel for the defendants by electronically filing the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing, and by hand-delivery this date, to:

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